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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

NEETA THAKUR, KEN ALEX, NELL  
GREEN NYLEN, ROBERT HIRST,  
CHRISTINE PHILLIOU, and JEDDA  
FOREMAN, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States;  
DEPARTMENT OF GOVERNMENT  
EFFICIENCY (“DOGE”);  
AMY GLEASON, in her official capacity as  
Acting Administrator of the Department of  
Government Efficiency;  
NATIONAL SCIENCE FOUNDATION;

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Case No. 3:25-cv-04737-RL

**DECLARATION OF ANTHONY P.  
SCHOENBERG IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
TEMPORARY RESTRAINING  
ORDER AND MOTION FOR  
ADMINISTRATIVE RELIEF TO  
EXCEED PAGE LIMITATION**

DECL. OF ANTHONY P. SCHOENBERG IN SUPP. OF  
PLFS’ MOT. FOR TRO AND MOT. FOR ADMIN.  
RELIEF TO EXCEED PAGE LIMITATION

Case No. 3:25-cv-4737

1 BRIAN STONE, in his official capacity as  
 2 Acting Director of the National Science  
 3 Foundation;  
 4 NATIONAL ENDOWMENT FOR THE  
 5 HUMANITIES;  
 6 MICHAEL MCDONALD, in his official  
 7 capacity as Acting Chairman of the National  
 8 Endowment for the Humanities;  
 9 UNITED STATES ENVIRONMENTAL  
 10 PROTECTION AGENCY;  
 11 LEE ZELDIN, in his official capacity as  
 12 Administrator of the U.S. Environmental  
 13 Protection Agency;  
 14 UNITED STATES DEPARTMENT OF  
 15 AGRICULTURE;  
 16 BROOKE ROLLINS, in her official capacity as  
 17 Secretary of the U.S. Department of Agriculture;  
 18 AMERICORPS (a.k.a. the CORPORATION  
 19 FOR NATIONAL AND COMMUNITY  
 20 SERVICE);  
 21 JENNIFER BASTRESS TAHMASEBI, in her  
 22 official capacity as Interim Agency Head of  
 23 AmeriCorps;  
 24 UNITED STATES DEPARTMENT OF  
 25 DEFENSE;  
 26 PETE HEGSETH, in his official capacity as  
 27 Secretary of the U.S. Department of Defense;  
 28 UNITED STATES DEPARTMENT OF  
 EDUCATION;  
 LINDA MCMAHON, in her official capacity as  
 Secretary of the U.S. Department of Education;  
 UNITED STATES DEPARTMENT OF  
 ENERGY;  
 CHRIS WRIGHT, in his official capacity as  
 Secretary of Energy;  
 UNITED STATES DEPARTMENT OF  
 HEALTH AND HUMAN SERVICES;  
 ROBERT F. KENNEDY, JR., in his official  
 capacity as Secretary of the U.S. Department of  
 Health and Human Services;  
 UNITED STATES CENTERS FOR DISEASE  
 CONTROL;  
 MATTHEW BUZZELLI, in his official capacity  
 as Acting Director of the Centers for Disease  
 Control;  
 UNITED STATES FOOD AND DRUG  
 ADMINISTRATION;  
 MARTIN A. MAKARY, in his official capacity  
 as Commissioner of the Food and Drug  
 Administration;  
 UNITED STATES NATIONAL INSTITUTES  
 OF HEALTH;  
 JAYANTA BHATTACHARYA, in his official  
 capacity as Director of the National Institutes of

1 Health;  
2 INSTITUTE OF MUSEUM AND LIBRARY  
3 SERVICES;  
4 KEITH SONDERLING, in his official capacity  
5 as Acting Director of the Institute of Museum  
6 and Library Services;  
7 UNITED STATES DEPARTMENT OF THE  
8 INTERIOR;  
9 DOUG BURGUM, in his official capacity as  
10 Secretary of the Interior;  
11 UNITED STATES DEPARTMENT OF STATE;  
12 MARCO RUBIO, in his official capacity as  
13 Secretary of the U.S. Department of State;  
14 DEPARTMENT OF TRANSPORTATION;  
15 SEAN DUFFY, in his official capacity as  
16 Secretary for the U.S. Department of  
17 Transportation,  
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19 Defendants.  
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**DECLARATION OF ANTHONY P. SCHOENBERG**

I, Anthony P. Schoenberg, declare as follows:

1. I am a member in good standing of the State Bar of California and the bar of this Court. I represent all Plaintiffs in this action. This declaration is based on my personal knowledge, information, and belief. I also make this declaration pursuant to Local Rule 65-1(a)(5) regarding notice of the accompanying Motion for Temporary Restraining Order and Order to Show Cause (“TRO Motion”).

2. A true and correct copy of the Jan 20, 2025 Executive Order 14151 titled “*Ending Radical and Wasteful Government DEI Programs and Preferencing*” which is available at and has been downloaded from the official U.S. government website link, <https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-and-wasteful-government-dei-programs-and-preferencing/>, is attached as **Exhibit A**.

3. A true and correct copy of the January 21, 2025 Executive Order 14173 titled “*Ending Illegal Discrimination and Restoring Merit-Based Opportunity*” which is available at and has been downloaded from the official U.S. government website link, <https://www.whitehouse.gov/presidential-actions/2025/01/ending-illegal-discrimination-and-restoring-merit-based-opportunity/>, is attached as **Exhibit B**.

4. A true and correct copy of the January 20, 2025 Executive Order 14168 titled “*Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*” which is available at and has been downloaded from the official U.S. government website link, <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>, is attached as **Exhibit C**.

5. A true and correct copy of the January 20, 2025 Executive Order 14154 titled “*Unleashing American Energy*” which is available at and has been downloaded from the official U.S. government website link, <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/>, is attached as **Exhibit D**.

6. A true and correct copy of the February 19, 2025 Executive Order 14217 titled

1 “*Commencing the Reduction of the Federal Bureaucracy*” which is available at and has been  
 2 downloaded from the official U.S. government website link,  
 3 [https://www.whitehouse.gov/presidential-actions/2025/02/commencing-the-reduction-of-the-](https://www.whitehouse.gov/presidential-actions/2025/02/commencing-the-reduction-of-the-federal-bureaucracy/)  
 4 [federal-bureaucracy/](https://www.whitehouse.gov/presidential-actions/2025/02/commencing-the-reduction-of-the-federal-bureaucracy/), is attached as **Exhibit E**.

5 7. A true and correct copy of the March 14, 2025 Executive Order 14238 titled  
 6 “*Continuing the Reduction of the Federal Bureaucracy*” which is available at and has been  
 7 downloaded from the official U.S. government website link,  
 8 [https://www.whitehouse.gov/presidential-actions/2025/03/continuing-the-reduction-of-the-federal-](https://www.whitehouse.gov/presidential-actions/2025/03/continuing-the-reduction-of-the-federal-bureaucracy/)  
 9 [bureaucracy/](https://www.whitehouse.gov/presidential-actions/2025/03/continuing-the-reduction-of-the-federal-bureaucracy/), is attached as **Exhibit F**.

10 8. A true and correct copy of the January 20, 2025 Executive Order 14158 titled  
 11 “*Establishing and Implementing the President’s ‘Department of Government Efficiency’*” which is  
 12 available at and has been downloaded from the official U.S. government website link,  
 13 [https://www.whitehouse.gov/presidential-actions/2025/01/establishing-and-implementing-the-](https://www.whitehouse.gov/presidential-actions/2025/01/establishing-and-implementing-the-presidents-department-of-government-efficiency/)  
 14 [presidents-department-of-government-efficiency/](https://www.whitehouse.gov/presidential-actions/2025/01/establishing-and-implementing-the-presidents-department-of-government-efficiency/), is attached as **Exhibit G**.

15 9. A true and correct copy of the February 26, 2025 Executive Order 14222 titled  
 16 “*Implementing the President’s ‘Department of Government Efficiency’ Cost Efficiency Initiative*”  
 17 which is available at and has been downloaded from the official U.S. government website link,  
 18 [https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-](https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-cost-efficiency-initiative/)  
 19 [department-of-government-efficiency-cost-efficiency-initiative/](https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-cost-efficiency-initiative/), is attached as **Exhibit H**.

20 10. On June 4, 2025 at 9:37 p.m. and 9:49 p.m., I emailed Patrick Robbins, Acting U.S.  
 21 Attorney for the Northern District of California, Pamela Johann, Assistant United States Attorney,  
 22 Chief, Civil Division, for the Northern District of California, and David Devito, Assistant United  
 23 States Attorney, Acting Chief, Civil Division, for the Northern District of California, to inform  
 24 them that Plaintiffs would be filing a motion for a temporary restraining order (“TRO”) in this  
 25 case on June 5, 2025. I informed them that Plaintiffs would ask the Court to set a deadline for the  
 26 government’s response of June 9, 2025, and to set a hearing as soon as possible thereafter. I also  
 27 informed them that Plaintiffs would file an administrative motion for additional pages for their  
 28 memorandum in support of the TRO Motion. I asked whether Defendants would consent to

1 Plaintiffs filing a fifty-page memorandum in support of the TRO Motion.

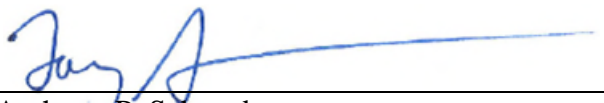
2 11. I received an email response from Mr. Devito at 11:27 a.m. on June 5, 2025, which  
3 acknowledged receipt and stated they were “conferring internally about the handling of this matter  
4 and will get back to you today on your questions.”

5 12. I received a subsequent email from Jason Altabet, a trial attorney in the Federal  
6 Programs Branch of the United States Department of Justice, at 1:30 p.m. on June 5, 2025. Mr.  
7 Altabet’s email stated that he is taking the lead on this matter for Defendants. He further stated  
8 that Defendants would not oppose Plaintiffs’ request for a 50-page brief in support of the TRO  
9 Motion, so long as Plaintiffs would agree to a Friday, June 13, 2025 deadline for Defendants to  
10 respond to the TRO Motion. I emailed Mr. Altabet back at 3:08 p.m. on June 5, 2025 and told him  
11 that Plaintiffs are agreeable to his proposal.

12 13. I called the Courtroom Deputy of this Department at 10:53 a.m. on June 5, 2025  
13 and left a voicemail message providing notice to the Court that we would be filing this temporary  
14 restraining order motion today. I also sent the Courtroom Deputy an email at 11:26 a.m. the same  
15 day conveying a similar message with additional detail.

16  
17 Dated: June 5, 2025

18  
19 By:

  
Anthony P. Schoenberg

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